

# **EXHIBIT 26**

HIGHLY CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

Page 1

1 HIGHLY CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER  
2

3 UNITED STATES DISTRICT COURT  
4 NORTHERN DISTRICT OF OHIO  
5 EASTERN DIVISION

6 -----  
7 IN RE: NATIONAL )  
8 PRESCRIPTION OPIATE )  
9 LITIGATION, )  
10 This document relates to: )  
11 Jennifer Artz v. Endo Health ) Case No. 17-md-2804  
12 Solutions, Inc., et al. )  
13 Case No. 1:19-OP-45459 ) Judge Dan Aaron  
14 ) Polster  
15 Darren and Elena Flanagan v. )  
16 McKesson Corporation, et al. )  
17 Case No. 1:18-OP-45405 )  
18 )  
19 Michelle Frost, et al., v. )  
20 Endo Health Solutions Inc., )  
21 et al. )  
22 Case No. 1:18-OP-46327 )  
23 )  
24 Walter and Virginia Salmons, )  
25 et al., v. McKesson )  
Corporation, et al. )  
Case No. 1:18-OP-45268 )  
Reported by:

DEPOSITION OF JACQUELINE RAMIREZ  
Oxnard, California  
Wednesday, February 5, 2020

Reported by:  
Lori M. Barkley  
CSR No. 6426  
Job No. 3971225-B

HIGHLY CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

Page 17

1 A. No, previous.

2 Q. Ms. Ramirez, do you know who you have sued  
3 in this action?

4 A. Basically the pharmaceutical companies.  
5 Basically the ones that knew and distributed the  
6 meds. So I guess that would be pharmaceutical  
7 companies, the distributors, I guess possibly some of  
8 the pharmacists that, I guess gave the meds --

9 Q. Okay. Your understanding is that you sued  
10 pharmaceutical manufacturers, distributors, and  
11 pharmacists?

12 A. No, not pharmacists. Pharmacy companies.

13 Q. Pharmacy companies.

14 A. Yes.

15 Q. Can you name any of the distributors you've  
16 sued in this case?

17 A. I believe there's Purdue, I believe there  
18 is, I think at the call Activist, Janssen.

19 Q. Not looking at the complaint, are you aware  
20 of --

21 A. Oh. So don't look --

22 Q. I'm just asking about your personal  
23 knowledge if you can name the defendants that you've  
24 sued in this case.

25 A. I believe one was Mallinckrodt. I believe

HIGHLY CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

Page 18

1 there's Janssen, who's -- which is part of  
2 Johnson & Johnson, I believe, which makes Dueagesics.

3 I believe there was -- oh, gosh. Some  
4 Walmarts were in there, some Walgreen's were in  
5 there, Von's.

6 And I can't remember the rest that I read.

7 Q. One more question about that.

8 Do you know what relief you are seeking in  
9 this lawsuit? And do you know what I mean by that  
10 when you say the relief you're seeking?

11 A. Can you explain it a little further?

12 Q. Sure.

13 What are you looking to get out of the  
14 lawsuit?

15 A. Basically monitor, surveillance for the  
16 children that are younger than my son. My son is 14.  
17 I'm hoping -- and I hate to say the word "hoping,"  
18 there's other children older than my son that's gone  
19 through that, because I wouldn't want any children  
20 going through this.

21 But I'm hoping so that he can be helped and  
22 everything that my son's gone through, so no other  
23 parents have to guess. They would have, like, some  
24 kind of monitoring where they can basically learn  
25 from what I have learned about the help from anybody

HIGHLY CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

Page 19

1 else, I didn't get.

2 Q. You mentioned that your son is 14, but what  
3 you're looking for would cover children that are  
4 younger than 14?

5 A. Yes. Younger children that are being  
6 born -- 'cause there are still children being born  
7 with NAS. I'm -- real quick.

8 MR. DANN: Tissues.

9 THE WITNESS: There's a lot of families out  
10 there that when my child was born with NAS, it wasn't  
11 really, I guess acknowledged that or it wasn't --  
12 maybe it was acknowledged, but it wasn't told that  
13 they can be born addicted and withdrawals and the  
14 developmental problems that they would go through  
15 throughout their life.

16 So I did a lot of research on my own.

17 BY MS. DESH:

18 Q. You did that research, when did you do that  
19 research?

20 A. After my child was born and I knew he wasn't  
21 reaching his developmental skills and milestones, I  
22 would search Google, go to the library, and try to  
23 find anything that would correlate with what he's  
24 got.

25 A lot of times, there wasn't no answers. I

HIGHLY CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

Page 30

1 taking it. You guess the embarrassment. Because it  
2 thinned out my hair, my hair would fall out and I  
3 would get blanches and I was very skinny.

4 And I just -- I just stopped taking it -- I  
5 mean, I just went off of it. Told my mom I'm not  
6 taking this no more.

7 Q. So I know that you had custody until she was  
8 maybe an adult of your niece; is that right, Josalyn?

9 A. Correct.

10 Q. Okay. Have any other children lived with  
11 you in your home?

12 I saw a name Romero Ramirez. Is that  
13 somebody that you know?

14 A. No. Probably Roman Ramirez.

15 Q. Maybe it was a misspelling.

16 So you've been married to Roman since 1998.  
17 Have you been separated from Roman?

18 A. No legal separation, just you get kind of  
19 like an upset kind of thing, which having a special  
20 needs child can -- when you're doing a lot of  
21 multiple work -- yes, I understand he works.

22 But yes, there was -- yeah, separation for  
23 two weeks, a week, where it's like, okay, we're going  
24 to separate, he would go to his mom's and he would  
25 stay for a short period of time, like I said, a week

HIGHLY CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

Page 31

1 or two, and come back.

2 So if you call that separation, I guess  
3 it's -- you know.

4 Q. Did that happen on and off for several  
5 years?

6 A. Yes. I think it was more so me saying, you  
7 know, I'm overwhelmed, I just -- and you guess you  
8 would say, I was a little younger and when you put in  
9 the mix trying to raise a special needs child. And I  
10 kind of felt I was doing most of the work.

11 But now that I'm older, I can kind of  
12 understand why I was doing most of the work because  
13 he was going to work to provide for the family and  
14 especially because we needed his health insurance for  
15 [REDACTED].

16 Q. Have you had health insurance continuously  
17 since you were married to Roman?

18 A. Yeah.

19 Q. So you think the separation is due to your  
20 feelings of being overwhelmed with your ability to  
21 care for [REDACTED] and sort of the stressors in the home  
22 related to that?

23 A. Yes.

24 Q. Roman was a little unclear about his work  
25 schedule.